

# Exhibit D



165 West 46th Street

New York, NY 10036-2582

Phone: (212) 869-9380 or (800)  
344-5220

Fax: (212) 869-1879

Website: [www.equityleague.org](http://www.equityleague.org)

May 6, 2022

Bernard Abrams, Producer and Guarantor  
Paradise Square Production Services Inc.  
1650 Broadway Ste 608  
New York, NY 10019  
[babrams@stageventures.ca](mailto:babrams@stageventures.ca)

Re: **ATTORNEY LETTER**

Equity-League Pension, Health and 401(k) Trust Funds –  
AEA # 0109033148 “Paradise Square”

Dear Mr. Abrams:

I am an attorney employed by the Equity-League Pension and Health Trust Funds (the “Funds”) and am writing to you regarding certain delinquent contributions, remittance reports and interest. As you know, your Company is obligated to remit contributions, remittance reports and interest to the Funds pursuant to the terms and conditions of the collective bargaining agreements between your Company and Actors’ Equity Association. Your company has already been advised of the following delinquencies by the Fund Office:

“Paradise Square” weeks ending 2/27/22-4/17/22:

1. Pension is due in the amount of **\$46,059.36**.
2. Health is due in the amount of **\$50,850.00**.
3. 401-K Deferral is due in the amount of **\$42,476.78**
4. 401-K Employer Contribution is due in the amount of **\$29,809.70**.
5. Interest is due as of today in the amount of **\$484.90**. Interest accrues on a daily basis and will continue to accrue until all contributions are paid in full.
6. Total amount due is **\$169,680.74**.

Your Company is obligated to immediately remit all contributions, reports and interest now due. This letter affords your Company the opportunity to do so without a lawsuit. However, unless the Company cures its delinquencies to the Funds forthwith, the Funds will take such legal action as they deem appropriate in order to protect their interests, up to and including the commencement of a collection action in federal court.

You should be aware that the Company's failure to contribute to the Funds, as stipulated in the collective bargaining agreement, violates Section 515 of the Employee Retirement Income Security Act of 1974, as amended by the Multi-Employer Pension Plan Amendments Act of 1980 ("ERISA"). Furthermore, Section 502(g)(a) of ERISA provides that, in any legal action in which a judgment in favor of the Funds is awarded, the court is required to award to the Funds the full amount of the delinquencies, and all accrued interest thereon plus liquidated damages equal to the greater of (i) the accrued interest or (ii) 20% of the aggregate amount of the delinquencies, in addition to the imposition of court costs and attorneys' fees. Finally, the Company will be added to the Actors' Equity Association's Defaulting Employer List. In view of the foregoing, we trust that you will cure the delinquencies to the Funds immediately.

If you have any questions regarding this delinquency, please contact me at (212) 293-4420.

Sincerely,



Agnes A. Leyden, Esq.

cc: Vincent Cinelli (Director of Operations, Equity League Pension and Health Funds)  
Emilya Peltekova (Equity League Pension and Health Funds)  
Winston Griffin (Equity League Pension and Health Funds)  
Marty Picari (Equity League Pension and Health Funds)  
Kevin Gallagher, Paradise Square Production Services Inc.  
Jeffrey Chrzczon, Paradise Square Production Services Inc.  
Doria Montfort (AEA Business Representative – New York Office)  
Dana Gal (AEA Senior Business Representative – New York Office)  
Sara Corello, Esq., Spivak Lipton LLP